

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
)	
v.)	CASE NO. 12 CR 00087
)	
RONALD WATTS,)	Honorable
Defendant)	Sharon Johnson Coleman
)	Judge Presiding

**MOTION IN LIMINE FOR AN ORDER REQUIRING THE GOVERNMENT TO
GIVE IMMEDIATE NOTICE OF ITS INTENTION TO USE CERTAIN OTHER
CRIMES, WRONGS, OR ACTS EVIDENCE**

NOW COMES THE DEFENDANT, Ronald Watts, through his attorneys, The Law Offices of Thomas Glasgow LTD, pursuant to Rule 12(d)(2), F.R.Cr.P. and Rule 104(a) and (c) F.R.E., and moves this Honorable Court for an entry of an Order requiring the Government to give immediate notice of it's intention to use at trial in the instant matter, either in its case in chief, during cross-examination of the defendant, or in its rebuttal case, the following:

1. Evidence of "other crimes, wrongs, or acts" of the defendant, as that phrase is used in section 404(b) of the Federal Rules of Evidence.

- (a) In regard to the notice, the Government should identify and describe:
 - (i) The dates, times, places, and person involved in the crimes, wrongs or acts;
 - (ii) The statements of each participant in the other crimes, wrongs, or acts;
 - (iii) The documents which contain evidence of the other crimes, wrongs or

acts, including when the documents were prepared, who prepared the documents, and who has possession of the documents; and

- (iv) The issue or issues to which the Government believes such other crimes, wrongs or acts evidence is relevant with Federal Rule of evidence 404(b).

2. Evidence of “specific instances of conduct” of the defendant as that phrase is used in Federal Rule of Evidence 608(b).

(a) In regard to the notice, the Government should identify and describe:

- (i) The dates, times, places, and person involved in the specific act of misconduct.
- (ii) The statements of each participant in the specific acts of misconduct; and
- (iii) The documents which contain evidence of the specific acts of misconduct, including when the documents were prepared, who prepared the documents, and who has possession of the documents; and
- (iv) The issue or issues to which the Government believes such other crimes, wrongs or acts evidence is relevant with Federal Rule of evidence 608(b)

WHEREFORE, defendant Ronald Watts respectfully requests this Honorable Court for an order requiring the Government to give immediate notice of its intention to use certain other crimes, wrongs, and acts evidence in the manner stated above.

Respectfully submitted
s/Thomas Glasgow

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